1	STEVEN P. KRAFCHICK (WA SBN 13542)	
2	KRAFCHICK LAW FIRM 100 W. Harrison, South Tower, Suite 300	
3	Seattle, WA 98119 Tel: (206) 374-7370, Fax: (206) 374-7377	
4	E-mail: klf@krafchick.com	
	Appearing Pro Hac Vice	
5	ABRAHAM N. GOLDMAN (SBN 102080) ABRAHAM N. GOLDMAN & ASSOCIATES, I	LTD
6	P.O. BOX 120 / 12896 Rices Crossing Road Oregon House, CA 95962-0120	
7	Tel: (530) 692-2267 Fax: (530) 692-2543	
8	E-mail: agoldman@succeed.net	
9	Attorneys for Plaintiff CHAD BILBREY	
10	ADRIENNE C. PUBLICOVER (SBN 161432) Email: adrienne.publicover@wilsonelser.com	
11	DENNIS J. RHODES (SBN 168417) Email: dennis.rhodes@wilsonelser.com	
12	WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP	
13	525 Market Street, 17 th Floor San Francisco, California 94105	
14	Tel: (415) 433-0990 Fax: (415) 434-1370	
15	Attorneys for Defendants RELIANCE STANDARD INSURANCE COMPANY, MATRIX ARSENCE MANAGEMENT, INC. and	
16	MATRIX ABSENCE MANAGEMENT, INC. ar GROUP WELFARE BENEFIT PLAN	iu
17		DICEDICE COURT
18	UNITED STATES DISTRICT COURT	
19	NORTHERN DISTRICT OF CALIFORNIA	
20	CHAD BILBREY,	Case No.: 09-cv-03399 MHP
21	Plaintiff,	SECOND STIPULATION TO EXTEND TIME TO FILE SECOND AMENDED
22	V.	COMPLAINT TO JULY 26, 2010; AND
	RELIANCE STANDARD INSURANCE COMPANY, MATRIX ABSENCE	TO RESET STATUS CONFERENCE; [PROPOSED] ORDER THEREON
23	MANAGEMENT, INC., GROUP WELFARE BENEFIT PLAN, LAM RESEARCH	[Local Rule 6-2]
24	CORPORATION,	Courtroom: 15 Judge: The Hon. Marilyn H. Patel
25	Defendants,	
26		Supporting DocumentsDeclaration of Abraham N. Goldman
27	//	
28		
	2 ND STIDLIL ATION TO EXTEND TIME TO EILE SECO	1 ND AMENDED COMPLAINT TO HILV 26 2010, AND

2ND STIPULATION TO EXTEND TIME TO FILE SECOND AMENDED COMPLAINT TO JULY 26, 2010; AND TO RESET STATUS CONFERENCE;[PROPOSED] ORDER THEREON Case No.: 09-cv-03399 MHP

Case 3:09-cv-03399-MHP Document 68 Filed 06/22/10 Page 2 of 3

1	IT IS HEREBY STIPULATED, pursuant to Local Rule 6-2, by and between Plaintif	
2	Chad Bilbrey and Defendants Reliance Standard Insurance Company ("Reliance Standard")	
3	Matrix Absence Management, Inc. ("Matrix"), Group Welfare Benefit Plan and LAM Research	
4	Corporation, through their attorneys of record, that the time for plaintiff to file his Second	
5	Amended Complaint, currently set for June 25, 2010, shall be continued to July 26, 2010.	
6	Further, if this stipulation is granted, the parties stipulate and request that the Statu	
7	Conference, which was previously continued by the Court from May 17, 2010 to July 26, 2010, be	
8	continued to a date after July 26, 2010, convenient for the calendars of the parties and the Court.	
9	As set forth in the attached Declaration, the parties are currently engaged in serious and	
10	significant settlement discussion. The parties are optimistic that these negotiations will result in	
11	the complete resolution of this matter before a new Amended Complaint needs to be filed and	
12	another Status Conference needs to be held.	
13	Pursuant to Local Rule 6-2, the declaration of Abraham N. Goldman in support of this	
14	motion is filed contemporaneously with this stipulation and order.	
15	Dated: June 17, 2010 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP	
16	By: <u>/s/ Dennis J. Rhodes</u> ADRIENNE C. PUBLICOVER	
17	DENNIS J. RHODES, Attorneys for Defendants	
18	RELIANCE STANDARD INSURANCE CO. MATRIX ABSENCE MANAGEMENT, INC.	
19	and GROUP WELFARE BENEFIT PLAN	
20	Dated: June 17, 2010 ABRAHAM GOLDMAN & ASSOCIATES LTD. Per: /s/ Abraham Goldman	
21	ABRAHAM GOLDMAN, Attorney for Plaintiff	
22	CHAD BILBREY Dated: June 17, 2010 KRAFCHICK LAW FIRM.	
23	Per: <u>/s/ Steven P. Krafchick</u> STEVEN P. KRAFCHICK, Attorney for Plaintiff	
24	CHAD BILBREY	
25	<u>ORDER</u>	
26	Pursuant to stipulation of the parties, the time for plaintiff to file his Second Amended	
27	Complaint is extended from June 25, 2010 to July 26, 2010. The Status Conference reset from	
28		

Case 3:09-cv-03399-MHP Document 68 Filed 06/22/10 Page 3 of 3

May 17, 2010 to July 26, 2010, is hereby reset to August 30, 2010, with a Joint Supplemental

By:

Status report to be filed one week prior to the Status Conference.

 $\|_{\mathbf{I}'}$

IT IS SO ORDERED.

Dated: June 21, 2010

3 | 4

HONORABLE MARIL YNLLUNITED ST. IT IS SO ORDERED

Judge Marilyn H. Patel

Judge Marilyn H. Patel